

C16-0384

EAB/cmw

March 24, 2016

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION - COLUMBUS

IN RE:) CASE NO. 16-51193
)
Tami J Jeter) CHAPTER 13
fka Tami J Dexter)
fka Tami J Coleman) JUDGE C. Kathryn Preston
fka Tami J Osborne)
) **OBJECTION TO CONFIRMATION**
Samuel L Jeter, Jr.) **OF THE CHAPTER 13 PLAN**
)
Debtors)

Now comes Credit Acceptance Corporation, a creditor herein holding a secured claim in the within proceedings, by and through counsel, pursuant to 11 U.S.C, Section 1324 and objects to the confirmation of the plan, based upon the proposed valuation of the collateral for the following reasons:

1. The within case was filed on February 29, 2016 and is governed by BAPCPA of 2005.

2. Creditor has a security interest in a 2012 Chevrolet Malibu VIN# 1G1ZE5E0XCF104407.

3. On May 24, 2013, the Debtors listed above (collectively, the "Debtor") obtained a loan from Creditor for the purchase of said 2012 Chevrolet Malibu.

4. The monthly payment amount is \$614.83 and Creditor is owed \$14,811.23.

5. The value of the collateral is \$11,950.00, pursuant to Black Book.

6. Creditor should be secured to the extent of the value of the collateral in the amount of \$11,950.00 together thereon with the interest at the rate of 6.5% mandated by In re Till, 541 U.S. 465, 1245 Ct. 1951.

7. The Plan provides for fixed monthly payment amount, however Creditor should receive a minimum monthly payment amount of \$250.00.

8. Debtor shall provide Creditor with proof of insurance for the 2012 Chevrolet Malibu prior to the confirmation of the Chapter 13 Plan.

9. The objection that is raised herewith is a standing objection and shall continue with reference to the currently proposed plan and any subsequently modified plan or plans.

WHEREFORE, Creditor prays that this Court deny confirmation of the Debtor(s) proposed Chapter 13 Plan.

/s/ Edward A. Bailey
REIMER, ARNOVITZ, CHERNEK &
JEFFREY CO., L.P.A.
BY: Edward A. Bailey #0068073
BY: Cynthia A. Jeffrey #0062718
BY: Peter M. O'Grady #0093349
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Notice of Hearing

Parties in interest shall take notice that the within Objection of Credit Acceptance Corporation to Confirmation of Chapter 13 Plan shall come on for hearing on May 19, 2016 at 1:00 p.m., in conjunction with the confirmation hearing in the within matter.

/s/ Edward A. Bailey
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 24, 2016, a true and correct copy of the foregoing Objection was served via the Court's electronic case filing system on the following who are listed on the court's Electronic Mail Notice List:

1. Office of the U.S. Trustee
Served via: (registered address)@usdoj.gov
2. Frank Pees, Trustee
Served via: trustee@ch13.org
3. Mina N Khorrami, Esq.
Served via: mnkecf@mnk-law.com

And by regular U.S. mail, postage prepaid, to:

1. Tami J Jeter
Samuel L Jeter, Jr., Debtor
5823 Maple Tree Lane
Columbus, OH 43232

/s/ Edward A. Bailey
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